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August 30, 2021

VIA ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Moreno-Godoy v. Gallet Dreyer & Berkey
Docket Number 14 Civ. 7082 (PAE)

Your Honor:

I am in receipt of your Honor's order placing the above-referenced case on the trial calendar for December 13th and providing me with a two-week window in which to obtain new counsel. In an effort to expedite matters, I will not take two weeks and have already entered my notice of appearance *pro se* in this action.

Now that I have entered my appearance and mindful of the trial date set by the Court, I respectfully request a settlement conference with all parties at the soonest possible date convenient to the Court and the parties. I have conferred with David S. Douglas, counsel for co-defendant, Gallet Dreyer & Berkey, LLP and he joins in this request for a settlement conference. I understand in making this request that there may be some delay in moving Mr. Moreno-Godoy here for the settlement conference from FCI Talladega, where he is currently incarcerated. Accordingly, I request that the Court commence the process by issuance of the requisite Writ to the Bureau of Prisons, ordering the production of Mr. Moreno-Godoy (Register # 60461-054) in this District. Mr. Moreno-Godoy's presence in this District and full participation in all settlement discussions, including the settlement conference with this Court, will facilitate the possibility of settlement sufficiently in advance of the scheduled trial date.

In light of my entry into the case and immediate request for an expeditious settlement conference, I respectfully request that the Court allow me to delay the filing of any motions, including a motion to amend the pleadings, until such time as the parties have had the opportunity to engage in the meaningful settlement efforts mentioned herein.

Thank you for your consideration.

Respectfully submitted,

Roger L. Stavis

cc: All Counsel (via ECF)